

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TESSERA ADVANCED TECHNOLOGIES,
INC.

Plaintiff,

v.

SAMSUNG ELECTRONICS CO. LTD. AND
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:17-cv-00671-JRG

JURY TRIAL REQUESTED

P.R. 4-3 JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Plaintiff Tessera Advanced Technologies, Inc. (“Tessera” or “Plaintiff”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung” or “Defendants”) respectfully submit the below Joint Claim Construction and Prehearing Statement in accordance with P.R. 4-3. The patents asserted in this case for which claim construction is required are U.S. Patent Nos. 6,512,298 (the “298 patent”) and 6,852,616 (the “616 patent”). These patents are included as Exhibits A and B to this joint statement.

I. AGREED TERMS AND AGREED CONSTRUCTIONS

The parties were unable to agree to any constructions at this time.

II. DISPUTED TERMS

In accordance with the meet and confer process pursuant to P.R. 4-2(c), the parties have met and conferred to discuss their P.R. 4-1 and P.R. 4-2 exchanges and have attempted to narrow the number of disputes for the remainder of the claim construction process. Tessera’s and

Samsung's proposed constructions and identified support for the disputed claim terms are presented in Appendix A.

III. ANTICIPATED LENGTH OF TIME NECESSARY FOR THE CLAIM CONSTRUCTION HEARING

The parties anticipate needing no more than 2 hours for the Claim Construction Hearing, currently scheduled to begin September 17, 2018 at 1:30 p.m.

IV. ANTICIPATED WITNESSES TO BE PRESENTED AT THE CLAIM CONSTRUCTION HEARING

The parties do not expect to present live testimony of witnesses at the Claim Construction Hearing. As identified in Appendix A, the parties may submit expert declarations from various experts with the claim construction briefings.

V. OTHER ISSUES FOR PREHEARING CONFERENCE

At this time, a prehearing conference prior to the Claim Construction Hearing is not scheduled with the Court. Currently, the parties do not believe there to be any additional issues that would necessitate the scheduling of such a prehearing conference.

Dated: June 22, 2018

Respectfully submitted,

/s/ CLEMENT J. NAPLES by permission Claire Henry /s/ John Kappos by permission Claire Henry

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email on this 22nd day of June, 2018.

/s/ Claire Henry

APPENDIX A

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U.S. PATENT NOS. 6,232,231 (CLAIMS 1-6, 8-13) AND 6,852,616 (CLAIMS 1-6, 8-9)¹

Claim Term(s) From '298/'616 Patents	Plaintiff's Proposed Construction And Support	Defendants' Proposed Construction And Support
<p>“external electrode”</p> <p>'298 patent, claims 1, 8, 12, 13</p> <p>'616 patent, claims 1, 8, 9</p>	<p>“electrode in [a/the] package for connection to external equipment”</p> <p><u>Intrinsic Evidence</u></p> <p>'298 Patent at Abstract, 1:7-2:29, 2:31-3:37, 3:44-47, 3:65-4:27, 4:51-5:50, 5:54-6:9, 6:6-23, 6:28-58, 7:14-26, 7:35-56, 8:4-48, 8:54-58, 9:11-60, 10:3-16, 10:19-67, 11:40-12:4, Figs. 1-5, claims 1-6, 8-12.</p> <p>'616 Patent at Abstract, 1:7-2:29, 2:31-3:37, 3:44-47, 3:65-4:27, 4:51-5:50, 5:54-6:9, 6:6-23, 6:28-58, 7:14-26, 7:35-56, 8:4-48, 8:54-58, 9:11-60, 10:3-16, 10:19-67, 11:40-12:4, Figs. 1-5, claims 1-6, 8-9.</p> <p>'298 Patent File History, Non-Final Office Action dated April 23, 2002, Amendment dated May 17, 2002, Notice of Allowability dated August 13, 2002, Certificate of Correction dated May 14, 2007, cited prior art</p>	<p>“portion of a conductive pattern configured to contact an ‘external electrode terminal’ (as defined below) or external equipment”</p> <p><u>Intrinsic Evidence</u></p> <p>'298 Patent at Abstract, 1:29-51, 1:55-3:48, 3:12-48, 3:65-4:27, 4:19-27, 4:51-6:9, 6:6-23, 6:28-55, 7:14-26, 8:4-48, 9:11-60, 10:3-16, 10:45-67, 11:64-12:4, Figs. 2, 3AD, 4A-D, 5.</p> <p>'298 Patent File History, Non-Final Office Action dated April 23, 2002, Notice of Allowability dated August 13, 2002, cited prior art</p> <p>'616 Patent File History, Non-Final Office Action dated December 31, 2003, Applicant's Amendment and Remarks dated June 1, 2004, Notice of Allowability dated June 22, 2004, cited prior art</p> <p><u>Extrinsic Evidence</u></p> <p>McGraw-Hill Dictionary of Engineering at p. 191 (2003)</p>

¹ The '298 and '616 patents share substantially the same specification. The parties agree that citations to either specification preserve the ability to rely on corresponding text in each specification. The parties further reserve the right to rely on evidence disclosed by the other party.

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Claim Term(s) From '298/'616 Patents	Plaintiff's Proposed Construction And Support	Defendants' Proposed Construction And Support
	<p>'616 Patent File History, Non-Final Office Action dated December 31, 2003, Applicant's Amendment and Remarks dated June 1, 2004, Notice of Allowability dated June 22, 2004, Certificate of Correction dated October 11, 2005, cited prior art</p> <p><u>Inter Partes Review</u></p> <p><u><i>Samsung Elecs. Co., Ltd. v. Tessera Advanced Technologies, Inc.</i>, IPR2018-01264, Doc. No. 1, Samsung's Petition for <i>Inter Partes</i> Review of U.S. Patent No. 6,852,616 (June 15, 2018), and exhibits thereto.</u></p> <p><u><i>Samsung Elecs. Co., Ltd. v. Tessera Advanced Technologies, Inc.</i>, IPR2018-01263, Doc. No. 1, Samsung's Petition for <i>Inter Partes</i> Review of U.S. Patent No. 6,512,298 (June 15, 2018), and exhibits thereto.</u></p> <p><u>Extrinsic Evidence</u></p> <p><i>Random House Webster's Unabridged Dictionary</i>, 2nd Edition, 1998, at 684-85.</p> <p><i>The American Heritage College Dictionary</i>, 3rd Ed., 1997, at 485.</p>	<p>The New Oxford American Dictionary at p. 549 (2001)</p> <p>The New Shorter Oxford English Dictionary at p. 796 (1993)</p> <p>Testimony of Peter Elenius and/or Pradeep Lall that "external electrode" should be construed to mean "portion of a conductive pattern configured to contact an 'external electrode terminal' (as defined below) or external equipment." The expert will explain the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of ordinary skill in the art at the time of the invention, how those of ordinary skill in the art at the time of the invention would have understood statements made by the patentee during prosecution of the applications, the indefiniteness of any of the asserted claims, and the level of ordinary skill in the relevant art. The expert may also offer a declaration, if necessary, to respond to Tessera's contentions, any expert testimony on behalf of Tessera, or for the Court's benefit.</p>

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Claim Term(s) From '298/'616 Patents	Plaintiff's Proposed Construction And Support	Defendants' Proposed Construction And Support
	<p><i>The American Heritage College Dictionary</i>, 4th Ed., 2002, at 494.</p> <p><i>American Heritage Dictionary of English Language</i>, 4th Ed., 2000, at 628.</p> <p><i>Merriam-Webster's Collegiate Dictionary</i>, 10th Ed., 2001, at 411.</p> <p><i>Shorter Oxford English Dictionary</i>, 5th Ed., 2002, vol. 2 at 901-02.</p> <p><i>Webster's II New College Dictionary</i>, 3rd Ed., 2001, at 397.</p> <p><i>Modern Dictionary of Electronics</i>, 7th Ed., Rudolf F. Graf, 1999 at 113, 239, 381, 769-70, 778.</p> <p><i>The Illustrated Dictionary of Electronics</i>, 8th Ed., Stan Gibilisco, 2001 at 237, 368, 505, 510, 678.</p> <p>U.S. Patent No. 6,538,319.</p> <p>International Technology Roadmap for Semiconductors 2.0, 2015 Edition, Heterogeneous Integration, 2015.</p> <p>International Technology Roadmap for Semiconductors, 2007 Edition, Assembly and Packaging, 2007.</p>	

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Claim Term(s) From '298/'616 Patents	Plaintiff's Proposed Construction And Support	Defendants' Proposed Construction And Support
	<p>WLCSP and Flip Chip Bumping Technologies, Andrew Strandjord et al., Advanced Packaging, March 19, 2008.</p> <p>Wafer Level Packaging (WLP): Fan-in, Fan-out and Three-Dimensional Integration, Xuejun Fan, April 2010.</p> <p>SAMS232-0013163</p> <p>SAMS232-0027871</p> <p>SAMS232-0027882</p> <p>U.S. Patent No. 7,298,045</p> <p>U.S. Patent No. 9,640,499</p> <p>U.S. Patent App. 2001/0020739</p> <p>U.S. Patent App. 2005/0194686</p> <p>Plaintiff may rely on the testimony of Drs. Streit, Lee, and/or Kenny regarding the proper construction of this term and/or its definiteness.</p>	
“external electrode terminal”	<p>“terminal on the outer surface of the package for connection to external equipment”</p> <p><u>Intrinsic Evidence</u></p>	<p>“metallic ball or conductive bump configured to connect to external equipment”</p> <p><u>Intrinsic Evidence</u></p>

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<p>'298 patent, claims 8, 10-13</p> <p>'616 patent, claim 9</p>	<p>'298 Patent at Abstract, 1:7-2:29, 2:31-3:37, 3:44-47, 3:65-4:27, 4:51-5:50, 5:54-6:9, 6:6-23, 6:28-58, 7:14-26, 7:35-56, 8:4-48, 8:54-58, 9:11-60, 10:3-16, 10:19-67, 11:40-12:4, Figs. 1-5, claims 1-6, 8-12.</p> <p>'616 Patent at Abstract, 1:7-2:29, 2:31-3:37, 3:44-47, 3:65-4:27, 4:51-5:50, 5:54-6:9, 6:6-23, 6:28-58, 7:14-26, 7:35-56, 8:4-48, 8:54-58, 9:11-60, 10:3-16, 10:19-67, 11:40-12:4, Figs. 1-5, claims 1-6, 8-9.</p> <p>'298 Patent File History, Non-Final Office Action dated April 23, 2002, Amendment dated May 17, 2002, Notice of Allowability dated August 13, 2002, Certificate of Correction dated May 14, 2007, cited prior art</p> <p>'616 Patent File History, Non-Final Office Action dated December 31, 2003, Applicant's Amendment and Remarks dated June 1, 2004, Notice of Allowability dated June 22, 2004, Certificate of Correction dated October 11, 2005, cited prior art</p> <p><u>Inter Partes Review</u></p> <p><u><i>Samsung Elecs. Co., Ltd. v. Tessera Advanced Technologies, Inc.</i></u>, IPR2018-01264, Doc. No. 1, <u>Samsung's Petition for <i>Inter Partes</i> Review of U.S.</u></p>	<p>'298 Patent at Abstract, 1:7-13, 1:29-51, 1:55-3:48, 2:21-29, 3:65-4:27, 4:19-27, 4:51-6:9, 6:28-55, 7:14-26, 8:4-48, 9:11-60, 10:20-44, 11:20-39, 11:64-12:4, Figs. 2, 3A-D, 4A-D, 5.</p> <p>'298 Patent File History, Non-Final Office Action dated April 23, 2002, Notice of Allowability dated August 13, 2002, cited prior art</p> <p>'616 Patent File History, Non-Final Office Action dated December 31, 2003, Applicant's Amendment and Remarks dated June 1, 2004, Notice of Allowability dated June 22, 2004, cited prior art.</p> <p><u>Extrinsic Evidence</u></p> <p>U.S. Patent No. 6,054,773</p> <p>The IEEE Standard Dictionary of Electrical and Electronic Terms at pp. 1095-97 (6th ed. 1996)</p> <p>The IEEE Standard Dictionary of Electrical and Electronic Terms at pp. 1163-64 (7th ed. 2000)</p> <p>Modern Dictionary of Electronics at pp. 769-770 (1999)</p> <p>Wiley Electrical and Electronics Engineering Dictionary at p. 780 (2004)</p>

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	<p><u>Patent No. 6,852,616 (June 15, 2018), and exhibits thereto.</u></p> <p><u><i>Samsung Elecs. Co., Ltd. v. Tessera Advanced Technologies, Inc.</i>, IPR2018-01263, Doc. No. 1, Samsung's Petition for <i>Inter Partes</i> Review of U.S. Patent No. 6,512,298 (June 15, 2018), and exhibits thereto.</u></p> <p><u>Extrinsic Evidence</u></p> <p><i>Random House Webster's Unabridged Dictionary</i>, 2nd Edition, 1998 at 684-85.</p> <p><i>The American Heritage College Dictionary</i>, 3rd Ed., 1997, at 485.</p> <p><i>The American Heritage College Dictionary</i>, 4th Ed., 2002, at 494.</p> <p><i>American Heritage Dictionary of English Language</i>, 4th Ed., 2000, at 628.</p> <p><i>Merriam-Webster's Collegiate Dictionary</i>, 10th Ed., 2001, at 411.</p> <p><i>Shorter Oxford English Dictionary</i>, 5th Ed., 2002, vol. 2 at 901-02.</p>	<p>Merriam-Webster Collegiate Dictionary at p. 1216 (10th ed. 1998)</p> <p>American Heritage College Dictionary at p. 1399 (3rd ed. 1993)</p> <p>New Shorter Oxford English Dictionary at pp. 3253-54 (4th ed. 1993)</p> <p>American Heritage Dictionary of the English Language at p. 1852 (3d ed. 1996)</p> <p>Webster's II New College Dictionary at p. 1138 (1999)</p> <p>New Lexicon Webster Encyclopedic Dictionary of the English Language at p. 1020 (1991)</p> <p>Testimony of Peter Elenius and/or Pradeep Lall that "external electrode terminal" should be construed to mean "metallic ball or conductive bump configured to connect to external equipment." The expert will explain the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of ordinary skill in the art at the time of the invention, how those of ordinary skill in the art at the time of the invention would have understood statements made by the patentee</p>

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<p>"a second, thick conductive film selectively on the first, thin conductive film"</p> <p>'616 patent, claim 1</p>	<p>Plain and ordinary meaning, no construction necessary.</p> <p><u>Intrinsic Evidence</u></p> <p>'298 Patent at Abstract, 1:28-55, 1:58-2:15, 8:4-52, 9:11-64, 12:15-19, Figs. 1-5, claims 1-6, 8-12.</p> <p>'616 Patent at Abstract, 1:28-55, 1:58-2:15, 8:4-52, 9:11-64, 12:15-19, Figs. 1-5, claims 1-6, 8-9.</p> <p>'298 Patent File History, Non-Final Office Action dated April 23, 2002, Amendment dated May 17, 2002, Notice of Allowability dated August 13,</p>	<p>indefinite</p> <p><u>Intrinsic Evidence</u></p> <p>'616 Patent at Abstract, 1:33-55, 1:58-2:15, 8:8-52, 9:15-64, 13:1-19, Figs. 2, 3A-D, 4A-D, 5.</p> <p>'298 Patent File History, Non-Final Office Action dated April 23, 2002, Notice of Allowability dated August 13, 2002, cited prior art</p> <p>'616 Patent File History, Non-Final Office Action dated December 31, 2003, Applicant's Amendment</p>

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	<p>2002, Certificate of Correction dated May 14, 2007, cited prior art</p> <p>'616 Patent File History, Non-Final Office Action dated December 31, 2003, Applicant's Amendment and Remarks dated June 1, 2004, Notice of Allowability dated June 22, 2004, Certificate of Correction dated October 11, 2005, cited prior art</p> <p><u>Inter Partes Review</u></p> <p><u><i>Samsung Elecs. Co., Ltd. v. Tessera Advanced Technologies, Inc.</i>, IPR2018-01264, Doc. No. 1, Samsung's Petition for <i>Inter Partes</i> Review of U.S. Patent No. 6,852,616 (June 15, 2018), and exhibits thereto.</u></p> <p><u><i>Samsung Elecs. Co., Ltd. v. Tessera Advanced Technologies, Inc.</i>, IPR2018-01263, Doc. No. 1, Samsung's Petition for <i>Inter Partes</i> Review of U.S. Patent No. 6,512,298 (June 15, 2018), and exhibits thereto.</u></p> <p><u>Extrinsic Evidence</u></p> <p><i>Modern Dictionary of Electronics</i>, 7th Ed., Rudolf F. Graf, 1999 at 240-241, 252, 284, 456, 571, 643, 646.</p>	<p>and Remarks dated June 1, 2004, Notice of Allowability dated June 22, 2004, cited prior art.</p> <p><u>Extrinsic Evidence</u></p> <p>John H. Lau et al., <i>Chip Scale Package: Design, Materials, Process, Reliability, and Applications</i>, pp. 61-70, 97-105, 129-141, 519-527 (1999).</p> <p>Testimony of Peter Elenius and/or Pradeep Lall that the term "a second, thick conductive film selectively on the first, thin conductive film" is indefinite. The expert will explain the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of ordinary skill in the art at the time of the invention, how those of ordinary skill in the art at the time of the invention would have understood statements made by the patentee during prosecution of the applications, the indefiniteness of any of the asserted claims, and the level of ordinary skill in the relevant art. The expert may also offer a declaration, if necessary, to respond to Tessera's contentions, any expert testimony on behalf of Tessera, or for the Court's benefit.</p>

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	<p><i>The Illustrated Dictionary of Electronics</i>, 8th Ed., Stan Gibilisco, 2001 at 178, 251, 682, 687.</p> <p><i>Concise Dictionary of Engineering: A Guide to the Language of Engineering</i>, Ed. Ron Hanifan, 2014 at 56, 215.</p> <p>U.S. Patent No. 6,284,563</p> <p>Samsung's Interrogatory Responses and Invalidity Contentions</p> <p>Plaintiff may rely on the testimony of Drs. Streit, Lee, and/or Kenny regarding the proper construction of this term and/or its definiteness.</p>	
<p>"forming a second, thick conductive film selectively on the first, thin conductive film so as to fill up the first opening and second opening"</p> <p>'616 patent, claim 1</p>	<p>Plain and ordinary meaning, which includes "forming a second, thick conductive film selectively on the first, thin conductive film so as to plug or span the first opening and second opening."</p> <p><u>Intrinsic Evidence</u></p> <p>'298 Patent at Abstract, 1:28-55, 1:58-2:15, 4:51-5:6, 8:4-52, 9:11-64, 12:15-13:19, Figs. 1-5, claims 1-6, 8-12.</p>	<p>The term "a second, thick conductive film selectively on the first, thin conductive film" is indefinite as stated above</p> <p>plain and ordinary meaning for the remainder of the term</p> <p><u>Intrinsic Evidence</u></p> <p>' 616 Patent at Abstract, 1:33-55, 1:58-2:15, 4:54-5:9, 8:8-52, 9:15-64, 13:1-19, Figs. 2, 3A-D, 4A-D, 5.</p>

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Claim Term(s) From '298/'616 Patents	Plaintiff's Proposed Construction And Support	Defendants' Proposed Construction And Support
	<p><u>Extrinsic Evidence</u></p> <p><i>The American Heritage College Dictionary</i>, 3rd Ed., 1997, at 509.</p> <p><i>The American Heritage College Dictionary</i>, 4th Ed., 2002, at 518.</p> <p><i>American Heritage Dictionary of English Language</i>, 4th Ed. (2000) at 659.</p> <p><i>Merriam-Webster's Collegiate Dictionary</i>, 10th Ed., 2001, at 434-35.</p> <p><i>Shorter Oxford English Dictionary</i>, 5th Ed., 2002, vol. 2 at 956.</p> <p><i>Webster's II New College Dictionary</i>, 3rd Ed., 2001, at 418.</p> <p><i>Modern Dictionary of Electronics</i>, 7th Ed., Rudolf F. Graf, 1999 at 240-241, 252, 284, 456, 571, 643, 646.</p> <p><i>The Illustrated Dictionary of Electronics</i>, 8th Ed., Stan Gibilisco, 2001 at 178, 251, 682, 687.</p> <p><i>Concise Dictionary of Engineering: A Guide to the Language of Engineering</i>, Ed. Ron Hanifan, 2014 at 56, 215.</p>	<p>The Oxford Illustrated American Dictionary at p. 299 (1998)</p> <p>The Oxford Illustrated American Dictionary at p. 299 (1998)</p> <p>The Oxford American College Dictionary at p. 500 (2002)</p> <p>Chue San Yoo, <i>Semiconductor Manufacturing Technology</i>, pp. 128-133 (2008)</p> <p>Testimony of Peter Elenius and/or Pradeep Lall that the term "forming ... so as to fill up the first opening and second opening" is understandable to a layperson and should be afforded its plain and ordinary meaning. The expert will explain the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of ordinary skill in the art at the time of the invention, how those of ordinary skill in the art at the time of the invention would have understood statements made by the patentee during prosecution of the applications, the indefiniteness of any of the asserted claims, and the level of ordinary skill in the relevant art. The expert may also offer a declaration, if necessary, to respond to Tessera's contentions, any expert testimony on behalf of Tessera, or for the Court's benefit.</p>

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Claim Term(s) From '298/'616 Patents	Plaintiff's Proposed Construction And Support	Defendants' Proposed Construction And Support
	<p>U.S. Patent No. 6,538,319.</p> <p>U.S. Patent No. 6,784,545.</p> <p>Samsung's Interrogatory Responses and Invalidity Contentions</p> <p>Plaintiff may rely on the testimony of Drs. Streit, Lee, and/or Kenny regarding the proper construction of this term and/or its definiteness.</p>	<p><i>See also</i> cited evidence for “a second, thick conductive film selectively on the first, thin conductive film” above.</p>
<p>“a protective film formed ... having a property of repelling conductive material” /</p> <p>“forming a protective film having a property of repelling conductive material.”</p> <p>'298 patent, claim 8</p> <p>'616 patent, claim 8</p>	<p>Plain and ordinary meaning, no construction necessary.</p> <p><u>Intrinsic Evidence</u></p> <p>'298 Patent at Abstract, 1:29-51, 1:63-2:12, 3:66-4:28, 6:27-48, 8:33-48, 9:61-10:16, 11:20-12:4, Figs. 1-5, claims 1-6, 8-12.</p> <p>'616 Patent at Abstract, 1:29-51, 1:63-2:12, 3:66-4:28, 6:27-48, 8:33-48, 9:61-10:16, 11:20-12:4, Figs. 1-5, claims 1-6, 8-9.</p> <p>'298 Patent File History, Non-Final Office Action dated April 23, 2002, Amendment dated May 17, 2002, Notice of Allowability dated August 13, 2002, Certificate of Correction dated May 14, 2007, cited prior art</p>	<p>indefinite</p> <p><u>Intrinsic Evidence</u></p> <p>'298 Patent at Abstract, 1:29-51, 1:63-2:12, 3:66-4:2, 6:29-32, 8:33-47, 9:61-10:16, 11:20-12:4, Figs. 2, 3A-D, 4A-D, 5.</p> <p>'298 Patent File History, Non-Final Office Action dated April 23, 2002, Notice of Allowability dated August 13, 2002, cited prior art</p> <p>'616 Patent File History, Non-Final Office Action dated December 31, 2003, Applicant's Amendment and Remarks dated June 1, 2004, Notice of Allowability dated June 22, 2004, cited prior art</p> <p><u>Extrinsic Evidence</u></p>

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Claim Term(s) From '298/'616 Patents	Plaintiff's Proposed Construction And Support	Defendants' Proposed Construction And Support
	<p>'616 Patent File History, Non-Final Office Action dated December 31, 2003, Applicant's Amendment and Remarks dated June 1, 2004, Notice of Allowability dated June 22, 2004, Certificate of Correction dated October 11, 2005, cited prior art</p> <p><u>Inter Partes Review</u></p> <p><u>Samsung Elecs. Co., Ltd. v. Tessera Advanced Technologies, Inc.</u>, IPR2018-01264, Doc. No. 1, <u>Samsung's Petition for Inter Partes Review of U.S. Patent No. 6,852,616 (June 15, 2018), and exhibits thereto.</u></p> <p><u>Samsung Elecs. Co., Ltd. v. Tessera Advanced Technologies, Inc.</u>, IPR2018-01263, Doc. No. 1, <u>Samsung's Petition for Inter Partes Review of U.S. Patent No. 6,512,298 (June 15, 2018), and exhibits thereto.</u></p> <p><u>Extrinsic Evidence</u></p> <p><i>Modern Dictionary of Electronics</i>, 7th Ed., Rudolf F. Graf, 1999 at 508, 634, 709-10, 847.</p> <p><i>Concise Dictionary of Engineering: A Guide to the Language of Engineering</i>, Ed. Ron Hanifan, 2014 at 56, 210, 213, 228, 229, 260.</p>	<p>Peter Van Zant, <i>Microchip Fabrication</i>, pp. 389-410 (3d Ed. 1997)</p> <p>Jennie S. Hwang, <i>Modern Solder Technology for Competitive Electronics Manufacturing</i>, pp. 57-64 (1996)</p> <p>Testimony of Peter Elenius and/or Pradeep Lall that the terms "a protective film formed ... having a property of repelling conductive material" and "forming a protective film having a property of repelling conductive material" are indefinite. The expert will explain the technology, the state of the art at the time the patent application was filed, the meaning of claim terms or phrases as they would be understood by those of ordinary skill in the art at the time of the invention, how those of ordinary skill in the art at the time of the invention would have understood statements made by the patentee during prosecution of the applications, the indefiniteness of any of the asserted claims, and the level of ordinary skill in the relevant art. The expert may also offer a declaration, if necessary, to respond to Tessera's contentions, any expert testimony on behalf of Tessera, or for the Court's benefit.</p>

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	<p>International Technology Roadmap for Semiconductors 2.0, 2015 Edition, Heterogeneous Integration, 2015.</p> <p>WLCSP and Flip Chip Bumping Technologies, Andrew Strandjord et al., Advanced Packaging, March 19, 2008.</p> <p><i>Solder Reflow Technology Handbook</i>, Research International, Section 1: Solder Reflow Basics, 1998.</p> <p><i>Synaptics Inc. v. Amkor Tech., Inc.</i>, IPR2016-00866, Ex. 2001 (Declaration of Dr. Schaper) (July 13, 2016) and related exhibits.</p> <p>SAMS232-0013163</p> <p>SAMS232-0027871</p> <p>SAMS232-0027882</p> <p>U.S. Patent No. 6,030,889</p> <p>U.S. Patent No. 5,521,438</p> <p>U.S. Patent App. 2005/0194686</p> <p>U.S. Patent App. 2008/0206928</p>	

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